

UNITED STATES DISTRICT COURT

United States District Court
Southern District of Texas
FILED

for the

Southern District of Texas

JAN 24 2019

David J. Bradley, Clerk

United States of America)

v.)

Chelsea Nichole MADILL, YOB: 1989, USC)

Case No. *M-19-0168-M**Defendant(s)*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 25, 2018 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

Title 21 U.S.C. Section 841(a)
Title 21 U.S.C. Section 846Possession with the intent to distribute in excess of 28.5 kilograms of cocaine, a Schedule II Controlled Substance.
Conspiracy to possess with the intent to distribute in excess of 5 kilograms of cocaine, a Schedule II Controlled Substance.

This criminal complaint is based on these facts:

See Attachment A

 Continued on the attached sheet.Reviewed by: *Matthew deSaracho*
USA Jesse Salazar*Matthew deSaracho*

Complainant's signature

Special Agent Matthew deSaracho, DEA

Printed name and title

Sworn to before me and signed in my presence.

Date:

January 24, 2019 4:57pm *Peter E. Ormsby*

Judge's signature

City and state:

McAllen, Texas

Peter E. Ormsby

Printed name and title

ATTACHMENT A

In April 2008, agents with the Drug Enforcement Administration (DEA) and the Texas Department of Public Safety (DPS) initiated an investigation into a Drug Trafficking Organization (hereinafter referred to as the "DTO"), operating in the Rio Grande Valley of South Texas, Guadalajara, Mexico, Merida, Mexico, and other cities located in the northern part of the United States. Said investigation has revealed that members of the DTO, including Chelsea MADILL, have operated and traveled through the Southern District of Texas in furtherance of their drug trafficking activities. Based on the investigation, agents have determined that MADILL used companies to coordinate the transportation of cocaine loads concealed in cover loads from the Southern District of Texas to other destinations in the United States.

On or about May 25, 2018, agents conducted surveillance at a warehouse, located at 1305 East Pecan Boulevard, warehouse units "M" and "N", McAllen, Texas. During surveillance, agents observed a red Nissan sedan, with Missouri registration, registered to Hertz Car Rental in McAllen, Texas. Agents contacted a source of information (hereinafter referred to as "SOI"), and learned that the red Nissan was currently rented to MADILL. Agents later observed MADILL exit the aforementioned warehouse and meet with the driver of a tractor/trailer that had arrived at said location. Agents observed MADILL direct the driver of the tractor/trailer to back up to the loading dock of warehouse "M". After the tractor/trailer parked at the loading dock and while said trailer was loaded with a cover load, MADILL stayed with the driver just outside the tractor/trailer's driver side door. Agents followed the tractor/trailer after it departed the warehouse.

During a traffic stop, the driver of the tractor/trailer consented to a search of the tractor/trailer. With the assistance of a DPS canine and a United States Customs and Border Protection (CBP) x-ray scanning device, agents discovered twenty-two (22) vacuum sealed bundles of cocaine, weighing approximately twenty-eight and a half (28.5) kilograms. After a post-arrest interview, the driver was released.

Subsequent investigation and telephone toll records revealed that MADILL utilized a cellular telephone to communicate with other members of the DTO while she was in the McAllen, Texas area. Agents also learned from another SOI that MADILL had obtained the aforementioned warehouse in March 2018 to use for her company, MONSTERS INC. LOGISTICS. Subsequent investigation also revealed that MADILL had obtained the cover load used to conceal the cocaine, as evidenced by several bills of lading bearing MADILL's company, MONSTERS INC. LOGISTICS, as the shipper, and an additional company owned by MADILL, TITANIUM WHOLESALE AND RETAIL, as the received in Lombard, Illinois. On the day the seizure occurred, telephone toll analysis revealed that MADILL was in contact with a Mexican telephone number utilized by the leader of the DTO, who agents have identified during the investigation.

Telephone toll analysis also revealed that MADILL had contracted GPS tracking services through Brickhouse Security, a New York based company that provides GPS tracking devices and

services to customers. An administrative subpoena issued by agents to Brickhouse Security showed that MADILL had purchased multiple GPS devices that were used to track the cover load that was found to contain the cocaine seized on May 25, 2018, as well as other cover loads that are believed to have been utilized to transport narcotics and bulk United States currency.

Following the seizure, on or about May 31, 2018, MADILL traveled to Merida, Yucatan, Mexico. DEA agents conducted surveillance on MADILL upon arrival in Merida, and observed MADILL meet with the leader of the DTO, who is based in Mexico. On June 3, 2018, DEA agents conducted additional surveillance and observed MADILL board a flight in Merida, Mexico, and travel to Atlanta, Georgia. Mexican Federal authorities conducted an exit interview of MADILL, and learned that MADILL had stayed with an unidentified friend at an unidentified location. Upon entry into the United States via an international airport in Atlanta, Georgia, CBP inspectors verified that MADILL was in possession of the telephone she had used to communicate with other members of the DTO.

On or about August 8, 2018, agents obtained a consent to search the aforementioned warehouse from the owner, who had been previously notified of MADILL's intent to vacate the property and terminate the lease between herself and the owner. During the search, agents discovered multiple bills of lading for MONSTERS INC. LOGISTICS and TITANIUM WHOLESALE AND RETAIL indicating the transportation of cover loads from the aforementioned warehouse to another warehouse in Lombard, Illinois. Both the aforementioned warehouse, as well as the warehouse in Lombard, Illinois, were listed on all of the bills of lading. Additionally, agents discovered a vacuum sealer commonly used to vacuum pack narcotics, as well as discarded plastic wrappings consistent with the type and shape of wrappings used to conceal the narcotics seized on May 25, 2018.

Subsequent to the aforementioned cocaine seizure, a cooperating defendant advised agents that MADILL works for the aforementioned DTO as a drug trafficker. The cooperating defendant told agents that the DTO's drugs originated in McAllen, Texas. Said cooperating defendant admitted that he/she had worked for MADILL as a money courier and purchaser of cocaine, and identified other members of the DTO working with MADILL as well.